



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
EAST CHICAGO, INDIANA 46312

CHEMICALS, [REDACTED] AND PIGMENTS DEPARTMENT

January 22, 1981

Mr. W. E. Muno
Chemical Engineer
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

EPA Region 5 Records Ctr.



297595

Dear Mr. Muno:

On April 29, 1980, we submitted extensive information in response to U.S. EPA, Region V's 308 information demand on past waste disposal practices at Du Pont's East Chicago plant. After reviewing our submittal, EPA asked for considerable additional information and technical studies in an August 29, 1980 letter. In order to clarify this request and to discuss its contents, you and three other EPA representatives visited our plant on November 12, 1980. At that time, a plant tour was conducted to show EPA disposal sites reported in our April submittal. Following this tour, we discussed your August request. It is our understanding we resolved all items to EPA's satisfaction except the subject of groundwater monitoring. The items resolved were airborne emission sampling and process and miscellaneous information requests. As indicated during the meeting, we supplied all of our available information in our April 29, 1980 submittal.

As promised, we have considered further EPA's request for a study of potential groundwater contamination. EPA suggested that such a study could be carried out (as was done at Calumet Container) using 12 wells for a cost of about \$15,000. Our review and consideration leads us to believe a groundwater monitoring study at our East Chicago plant (1) would not be conclusive if based on our study alone, and (2) if undertaken, would involve several times the cost, time and technical effort of EPA's forecast.

The basis for these conclusions are:


- We know of no reason that our plant should be singled out for such a study at this time;
- Our plant is only one in a large industrial complex and is surrounded by other companies particularly in the metal refining and processing industry; and
- The hydrology and geology of the area would make a study difficult particularly in determining groundwater flow and communication of groundwater with local rivers and lakes.

For these reasons, we believe the study is not required and furthermore, if such a study were to be undertaken would be very involved and costly.

Therefore, we are asking that you withdraw EPA's requested groundwater monitoring study; at least for the present. A more productive program, we feel, would be to understand on a regional basis the hydrology and geology of the area and a detailed understanding of groundwater uses to determine if groundwater contamination were to occur what would be its fate and impact on the area. Such a study would and should involve all industrial and municipal concerns in the area.

While we believe the groundwater monitoring is not warranted at this time, please be assured that Du Pont will continue to cooperate with environmental agencies, as we have done in the past.

Sincerely,


J. T. Sixsmith

JTS/ld

cc: Oral Hert, Technical Secretary
Indiana Stream Pollution Control Board